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 Wells Fargo Bank, N.A. (“Wells Fargo”)

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

CHARLES P. HAGGARTY and GINA M.  
 HAGGARTY, on behalf of themselves and all  
 others similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.

Defendant.

Case No.: 3:10-cv-02416-CRB

[Assigned to the Hon. Charles R. Breyer]

**JOINT STIPULATION AND [PROPOSED]  
 ORDER CONCERNING DISCOVERY  
 DEADLINES AND BRIEFING  
 SCHEDULES AND PAGE LIMITS FOR  
 MOTION FOR CLASS CERTIFICATION  
 AND MOTION FOR SUMMARY  
 JUDGMENT**

Pursuant to Civil L. R. 7-12, Plaintiffs CHARLES P. HAGGARTY and GINA M. HAGGARTY, and Defendant WELLS FARGO BANK, N.A., having met and conferred through their counsel of record, submit this Joint Stipulation and Proposed Order Concerning Discovery Deadlines and Briefing Schedule and Page Limits for Motion for Class Certification and Motion for Summary Judgment.

A. The Parties stipulate and propose the following deadlines for discovery:

1. Fact Discovery Cutoff: August 3, 2012

2. Initial Expert Disclosures: August 3, 2012

At the time of disclosure, the disclosing party will provide 3 dates between Aug. 3-17, 2012 that the disclosed expert is available for deposition.

3. Rebuttal Expert Disclosures: August 17, 2012

At the time of disclosure, the disclosing party will provide 3 dates between Aug. 17-31, 2012 that the disclosed expert is available for deposition.

4. Expert Discovery Cutoff: August 31, 2012

B. The Parties stipulate and propose the following dates, deadlines and page limits regarding Plaintiffs' Motion for Class Certification and any Motion for Summary Judgment to be filed by Defendant:

1. Hearing on Motion for Class Certification: August 3, 2012 at 10:00 a.m.

a. Motion for Class Certification: June 22, 2012  
(not to exceed 30 pages)

b. Opposition (not to exceed 30 pages): July 11, 2012

c. Reply (not to exceed 15 pages): July 20, 2012

2. Hearing on Motion for Summary Judgment: September 14, 2012 at 10:00 a.m.

a. Motion for Summary Judgment: August 3, 2012  
(not to exceed 30 pages)

b. Opposition (not to exceed 30 pages): August 22, 2012

c. Reply (not to exceed 15 pages):

August 31, 2012.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: June 6, 2012

Respectfully submitted  
McCUNE WRIGHT, LLP

By: /s/ Richard D. McCune  
Richard D. McCune  
Attorney for Plaintiffs  
Charles P. Haggarty and Gina M. Haggarty.

Dated: June 8, 2012

REED SMITH, LLP

By: /s/ Jack R. Nelson  
Jack R. Nelson  
Attorneys for Defendant Wells Fargo Bank, N.A.

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

DATE: June 12, 2012

